

THE JAMES LAW FIRM
445 HAMILTON AVENUE
SUITE 1102
WHITE PLAINS, NY 10601
JJAMESLAW@OPTONLINE.NET
JACQUELINEJAMESLAW.COM

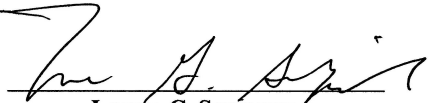
Hon. Judge Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

JACQUELINE M. JAMES, ESQ.

T: (914) 358 6423 November 13, 2024
F: (914) 358 6424

Application **DENIED** without prejudice to renewal. By **November 19, 2024**, Plaintiff shall refile any motion to seal contents that Plaintiff seeks to maintain under seal. Plaintiff shall also file under seal an unredacted version, with the redacted portions highlighted. Plaintiff shall support each request to redact or maintain under seal with the basis for the request. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Counsel is directed to review the Court's Individual Rules regarding sealing. The document at Dkt. No. 19 shall remain under seal at this time.

Dated: November 14, 2024
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: 1:24-cv-02502-LGS; Strike 3 Holding, LLC v. JOHN DOE subscriber assigned IP address 66.65.32.20 // Plaintiff's First Letter Motion for Leave to File Unredacted Versions of its First Amended Complaint, Proposed Summons, and Return of Service Under Seal

Dear Judge Schofield:

The James Law Firm, PLLC represents Plaintiff in the above-captioned matter. Plaintiff respectfully requests an order allowing Plaintiff leave to file unredacted versions of its First Amended Complaint, proposed summons, and return of service under seal.

Plaintiff is the owner of award-winning, critically acclaimed adult motion pictures. Strike 3's motion pictures are distributed through the *Blacked*, *Tushy*, *Vixen*, *Tushy Raw*, *Blacked Raw*, *MILFY*, and *Slayed* adult websites and DVDs. Plaintiff recorded a number of infringing transactions emanating from IP address 66.65.32.20 within the BitTorrent network. Accordingly, this Court recently permitted Plaintiff to serve a subpoena on the Internet Service Provider ("ISP"), Spectrum ("ISP"), to discover the identity of the subscriber assigned the IP address 66.65.32.20, the IP address used to download and distribute Plaintiff's works via the BitTorrent network. After receiving the subpoena response, Plaintiff conducted a further investigation. Based on the investigation of the subscriber and publicly available resources, Plaintiff identified the subscriber as the true infringer/Defendant. Plaintiff has now filed its First Amended Complaint against Defendant before this Court.

Although Plaintiff is aware of Defendant's identity, Plaintiff is sensitive to Defendant's privacy concerns and therefore, it opted to file this suit against Defendant pseudonymously within the caption of the case. Although the caption does not contain Defendant's personal identifying information, the body of the First Amended Complaint contains such information. This information is central to Plaintiff's claim and includes the Defendant's name, address, and additional factual information which directly links the Defendant to the infringement in this case. In the past, to avoid embarrassment to defendants, courts in this district have entered protective orders precluding Plaintiff from publicly disclosing defendants' identifying information. Accordingly, out of respect for this Court and Defendant, Plaintiff respectfully requests entry of an order permitting it to file an unredacted version of its First Amended Complaint, proposed summons, and return of service under seal under seal so that it may include Defendant's name, address, and other factual information central to Plaintiff's claim.

By: Jacqueline M. James

Attorneys for Plaintiff

Jacqueline M. James, Esq. (1845)

The James Law Firm, PLLC

445 Hamilton Avenue, Suite 1102

White Plains, New York 10601

T: 914-358-6423